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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHONDELL PITTS, individually and as legal
guardian of P.P.,

CASE NO.: 2:19-cv-01974

Plaintiffs,

v.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of
Clark County, Nevada; DAVID
NESHEIWAT, individually; FUELZONE
MART 2, LLC, a Nevada Limited Liability
Company; ALLEN JACKSON, an individual;
DOES 1 through 10,

Defendants.

STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO DOC. 57
MOTION FOR SUMMARY JUDGMENT
(FIRST REQUEST)

Plaintiffs Shondell Pitts and P.P. ("Plaintiffs"), by and through their attorney of record, Mitchell S. Bisson, Esq. of the Law Offices of Mitchell S. Bisson, and Defendants Las Vegas Metropolitan Police Department and Ofc. Nesheiwat ("LVMPD Defendants"), by and through their attorneys of record, Marquis Aurbach Coffing, submit this Stipulation and Order to Extend Time to Respond to Doc. 57 Motion for Summary Judgment.

Currently, the deadline to respond to Defendants' Motion for Summary Judgment is November 29, 2021. The parties respectfully request that the time for Plaintiffs to respond to LVMPD Defendants' Motion for Summary Judgment (Doc. 57) be extended **until December**

17, 2021. The parties further request that the time for Defendants to file a Reply also be extended accordingly.

The parties state that good cause exists for the requested extension. The holiday weekend is approaching, and Plaintiffs' counsel has represented he will be out of the jurisdiction the first week or so of December.

This extension request is made in good faith, jointly by the parties, and not for the purposes of delay. The parties will not be prejudiced by this extension.

WHEREFORE, the parties respectfully request that this Court extend the deadline for Plaintiff to file a response to Doc. 57 up to and including December 17, 2021, and that Defendants time to file a Reply be extended accordingly.

IT IS SO STIPULATED this 24th day of November, 2021.

LAW OFFICES OF
MITCHELL S. BISSON

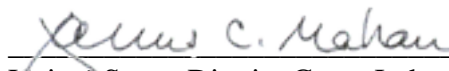
MARQUIS AURBACH COFFING

/s/ Mitchell S. Bisson
MITCHELL S. BISSON, ESQ.
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Attorney for Plaintiffs

/s/ Craig R. Anderson
Craig R. Anderson, Esq.
Nevada Bar No. 6882
10001 Park Run Drive
Las Vegas, Nevada 89145
*Attorney for Defendants LVMPD
and Ofc. Nesheiwat*

ORDER

IT IS SO ORDERED November 29, 2021.


United States District Court Judge

Re: [External] Request to Extend Time for Respond to Motion for Summary Judgment,
Case 2:19-cv-01974-JCM-VCF

Craig Anderson <canderson@maclaw.com>

Wed 11/24/2021 12:27 PM

To: Matthew Hughes <hughes@bissonlegal.com>

Cc: Sherri Mong <SMong@maclaw.com>; Mitchell Bisson <mbisson@bissonlegal.com>

Good by me

Sent from my iPhone

On Nov 24, 2021, at 9:41 AM, Matthew Hughes <hughes@bissonlegal.com> wrote:

Mr. Anderson,

Here attached is the Stipulation and Order to Extend Time to Respond to Motion for Summary Judgment, which you and Mitch discussed. Please review. Let us know if we have your approval to submit with you electronic signature! Thanks.

Matthew Hughes, Law Clerk for
Mitchell S. Bisson, Esq.
LAW OFFICES OF MITCHELL S. BISSON
911 N. Buffalo Dr., Ste. 201
Las Vegas, NV 89128
(702) 602-4990

From: Mitchell Bisson <mbisson@bissonlegal.com>

Sent: Tuesday, November 23, 2021 12:30 PM

To: Matthew Hughes <hughes@bissonlegal.com>

Subject: FW: [External] Activity in Case 2:19-cv-01974-JCM-VCF Pitts et al v. Las Vegas Metropolitan Police Department et al Motion for Summary Judgment

Later on today or tomorrow can you crank out an SAO for this? See below.

From: Craig Anderson <canderson@maclaw.com>

Sent: Tuesday, November 23, 2021 10:37 AM

To: Mitchell Bisson <mbisson@bissonlegal.com>

Cc: Sherri Mong <SMong@maclaw.com>; Matthew Hughes <hughes@bissonlegal.com>

Subject: Re: [External] Activity in Case 2:19-cv-01974-JCM-VCF Pitts et al v. Las Vegas Metropolitan Police Department et al Motion for Summary Judgment

No problem.

Sent from my iPhone